

EXHIBIT A

1 Q. All right. Now, under "optional
2 coverage 2," under "directors and officers
3 liability," it says "we will pay those sums
4 that the insured becomes legally obligated to
5 pay--

6 A. The insured is Emerald Ridge.

7 Q. -- as damages because of wrongful
8 acts committed by an insured solely in the
9 conduct of their management responsibilities
10 with the condominium association."

11 A. That's Emerald Ridge. That's when
12 you have where an insurance policy can be
13 liable for insuring the directors of the
14 corporation, they can be liable for both parts.
15 I'm very clear on the law.

16 Q. Now --

17 A. And they're not Emerald Ridge. The
18 suit was filed as them as individuals and then
19 separately Emerald Ridge Corporation.

20 Q. Let me go back. You have brought a
21 lawsuit against individuals who were members at
22 one time of the board of directors?

23 A. No, the ones that they were not
24 members of the board of directors at any point.

1 Q. At any time?

2 A. Ken Shareef, he's not even a
3 stockholder and you guys have insured him.
4 Maudy Melville was not a member of the board,
5 nor was Renford Brevard and nor was Mark Martel
6 who basically decided to take over the
7 corporation and then Mr. Brevard decided to go
8 ahead and join back in.

9 Q. When you sued them originally, what
10 court did you sue them in?

11 A. I originally I sued them in
12 chancery court just for them to basically pay
13 me the fees incurred as basically cleaning
14 Emerald Ridge up, the front of walls, and as
15 well as for the chancery court to basically
16 clarify for them to rule since they could not
17 understand them. It was very simple, for 500
18 and something dollars.

19 Q. So your original lawsuit in the
20 court of chancery was for money that you
21 expended somehow?

22 A. Correct, as a director.

23 Q. Why did you expend the money?

24 A. Because they asked for the services

1 and the person performed services and I believe
2 in paying people when they perform the
3 services. When they would not pay them, so I
4 paid them.

5 Q. Who asked for what services, that's
6 what I don't understand?

7 A. That was Ken Shareef and them asked
8 for the services.

9 Q. What services did they ask for?

10 A. They asked for the powering washing
11 of the monuments.

12 Q. They asked for power washing of
13 what?

14 A. Monuments.

15 Q. What's a monument?

16 A. When you first come in you have the
17 monuments on each side of the development.

18 Q. Okay. And when Ken Shareef asked
19 for that work to be done, what authority did he
20 have it under?

21 A. At that time he believed that he
22 could be a board member.

23 Q. Because he believed he was a board
24 member?

1 A. Correct.

2 Q. All right. What was his position
3 as a board member?

4 A. Not only was he not a stockholder
5 or director, he claimed the president position.

6 Q. So he claimed that he was the
7 president?

8 A. Until the attorney told him he
9 can't be.

10 Q. And he asked that something be
11 power washed?

12 A. That's when other members of the
13 corporation brought it to my attention that he
14 can't even make any decision as a board because
15 he's not even a homeowner.

16 Q. Was there power washing done?

17 A. Yes, there was.

18 Q. Who did it?

19 A. I think it's Aqua Wash. I'm not
20 sure.

21 Q. And approximately when was this
22 done, do you recall?

23 A. 2003. The month I don't know.

24 Q. Now, when that was done, when that

1 power washing was done, were you a member of
2 the board?

3 A. Yes, I was. According to the
4 Supreme Court of Delaware I was a member of the
5 board at all times in any of these cases. I'm
6 going by what the court has said, so now.

7 Q. You were on the board when the
8 power washing was done?

9 A. Correct.

10 Q. Did you have a vote in that
11 decision to power wash?

12 A. There wasn't a vote. It was
13 conversations back and forth through e-mail.
14 There was no vote.

15 Q. Were you involved in seeing the --

16 A. Yeah, they asked me would I oversee
17 it.

18 Q. Oversee what?

19 A. Making sure it gets done.

20 Q. And did you oversee it?

21 A. That's why I paid for it. Since I
22 got the guy to do it, I was not going to not
23 pay him.

24 Q. Okay. And the power washing was

1 done. You paid for it out of pocket?

2 A. Yes, I did.

3 Q. Or did you pay for it out of funds?

4 A. I paid for it out of my pocket
5 because they refused to him.

6 Q. Who refused to pay him?

7 A. Ken Shareef and Maudy Melville and
8 Renford Brevard who none of them were elected
9 at all.

10 Q. Why did they refuse to pay him?

11 A. Because they said that, oh, well,
12 we wanted you to come back and tell us what the
13 price was. I was like, that was not the
14 conversation, tell them what the price was.

15 Q. So you're saying they said that
16 they wanted just a price and you understood --

17 A. I have e-mails. I know. They said
18 so that was not part. The only conversation
19 that was taking place was with Ken Shareef and
20 myself.

21 Q. Okay. Ken's position is, make sure
22 I understand it, that he only wanted you to get
23 a price, but your position is that's not true,
24 it was authorized that they do the work?

1 A. That's my position at the time, but
2 now when I came to light he had no position
3 that he could stand on.

4 Q. All right. And how much did you
5 pay for this?

6 A. Power washing was 185.

7 Q. That was out of your own pocket?

8 A. Correct.

9 Q. Did you ask to be reimbursed?

10 A. I most certainly did.

11 Q. And were you ever reimbursed?

12 A. Even the corporation told me they
13 would reimburse me and they refused to
14 reimburse me when the corporation told them to
15 reimburse me and when I asked them to be
16 reimbursed. So the corporation took a vote to
17 reimburse all her money that she expended thus
18 far, including legal fees, and they said no.

19 Q. Who is "they"?

20 A. At that time it was Ken Shareef,
21 Renford Brevard and Maudy Melville. They said
22 they were discussing it with other people so
23 they didn't tell who the other people were.

24 Q. When you said the board agreed or

1 the condominium agreed --

2 A. The corporation. There was a
3 corporation meeting called where there were
4 numerous members there. They said why don't
5 you just pay her the money. She expended it.
6 Pay it to her. As well as give her all the
7 costs she's incurred. They said they were not
8 going to do that. They did not pay that until
9 after some time when some lawyer told them you
10 should have paid her.

11 Q. Have you ever been been paid?

12 A. No.

13 Q. So you're still out of pocket the
14 \$185?

15 A. I'm out of pocket way more than
16 \$185 at this point.

17 Q. With regard to the Aqua Wash?

18 A. Correct.

19 Q. Now, was there any other thing like
20 that where you made payment out of your own
21 pocket?

22 A. I made payment out of my pocket to
23 basically cover myself in these proceedings
24 although I'm a director.

1 Q. Forget the proceedings for a
2 minute. Let's just get to the things like
3 this. There was the Aqua Wash. Was there
4 anything else done?

5 A. No, there was not anything else
6 that I paid.

7 Q. Now, when you brought the lawsuit
8 in chancery, did you include in that a claim
9 for the \$185?

10 A. Yes, I did.

11 Q. And as I understand it, that's
12 never been decided by the court yet?

13 A. It's reassigned now to a superior
14 court judge.

15 Q. It's a superior court judge?

16 A. Yeah.

17 Q. When was that one?

18 A. A few months ago from what I
19 understand.

20 Q. So you're no longer --

21 A. Judge Vaughn is handling it.

22 Q. You're no longer in chancery, is
23 that what you're saying?

24 A. They reassigned it to Judge Vaughn

1 proceeding.

2 Q. What do you mean "a court
3 proceeding"?

4 A. As part of exhibits in chancery
5 court they had an exhibit saying outlining a
6 meeting they had in a meeting after the
7 corporation had already told them several
8 months ago pay up. They then decided they were
9 going to have their own little meeting and they
10 took a vote saying pay the power wash.

11 Q. Who took that vote? I'm not sure I
12 understand.

13 A. Whoever the persons who were
14 claiming that they were the board at that time.
15 It was several other people other -- Ken
16 Shareef eventually resigned once he realized
17 that he had no point and had the authority to
18 appoint these people or to be a director.
19 Renford Brevard has now resigned as well.

20 Q. But your understanding was that it
21 was a board meeting that agreed to pay the
22 \$185?

23 A. It was a meeting where they claimed
24 that they were the board. People that just

1 somehow became a board. They never were.

2 Q. And you're saying you would not
3 accept it now anyway?

4 A. I'm not accepting illegal funds.
5 They're not authorized to give me money from
6 the corporation. They never were elected. I
7 was on the board at that time still. No court
8 -- so if I'm on the board still, I'm not going
9 to say you can give me money now, we're in the
10 middle of litigation, from corporation funds
11 when you're not authorized to make that
12 decision.

13 Q. If they were authorized to make the
14 decision, would you take the money?

15 A. Not just the \$185. They should
16 have just paid the 600 or five something at
17 that particular point instead of going around
18 vandalizing my family property and harassing my
19 family and other things.

20 Q. Let me get to that. I'm trying to
21 get one step at a time. The first thing is the
22 \$185. The second monetary amount you're
23 claiming is the expenses of litigation?

24 A. Correct.

1 A. Right. I just told you, I said
2 effective the 30th. I'm still living where I
3 was. As of the 30th we will no longer have a
4 home or anywhere to live.

5 Q. Well, you said that you had to move
6 because of action by State Farm?

7 A. Because of the criminal activity
8 that State Farm funded which encouraged
9 terroristic activity.

10 Q. And what activity did State Farm
11 fund?

12 A. Basically they funded those people
13 so that they can have the funds to basically
14 harass my family. Basically --

15 Q. What people are they funding?

16 A. The ones that are claiming to be
17 directors. The ones that basically vandalized
18 our property. The ones that sent items through
19 the mailing inferring that we hurry up and move
20 and get out of here, which, mind you, came from
21 Maryland where State Farm is.

22 Q. Let's back up. What proof do you
23 have that anybody harassed you?

24 A. Like I said, I will have witnesses

1 that will come to court. When we come to court
2 witnesses that basically --

3 Q. Tell me your witnesses.

4 A. I first have to find out. I'm not
5 going to give their names.

6 Q. You've got to give me their names.

7 A. The corporation. Half of the
8 members of the corporation are so afraid
9 because even when they walked by and saw our
10 vehicles damaged, they were like, don't tell me
11 they resorted to this.

12 Q. I need to know the witnesses who
13 claim that they saw someone harassing you or
14 destroying your property.

15 A. As far as the person seeing them
16 destroy my property, I looked out the window
17 and I saw the people who basically vandalized
18 my property. They were certain members of the
19 board.

20 Q. Who vandalized your property?

21 A. Certain members of the board.

22 Q. "Certain" is not going to do it.
23 Name them for me because I'm going to talk to
24 them.

1 A. Certain members of the board. You
2 can talk to all of them.

3 Q. I don't want to talk to all of
4 them. I want to talk to the ones that harassed
5 you.

6 A. Like I said, as far as I'm
7 concerned, all of them harassed me.

8 Q. I don't know care just as far as
9 you say.

10 A. And that once I have an attorney I
11 will tell you. You will get all the other
12 discoverable --

13 Q. You said to me --

14 A. -- including for me to have
15 fingerprints done on the envelope that came
16 from Maryland where State Farm is located where
17 they basically instructed us to move quickly.
18 And including the person who lives eight miles
19 within State Farm who kept calling our house.

20 Q. We're going to get there. One step
21 at a time. You just told me that you saw
22 people vandalizing your property; is that
23 correct?

24 A. I said I saw people outside.

1 Whether or not did I see them when they
2 actually vandalized my property, whether or not
3 that's irrelevant.

4 Q. It's not irrelevant.

5 A. Number one, I lived there ten
6 years. Nothing has ever happened to our
7 residence. That's up to the jury to decide
8 whether or not they basically believe these
9 people based on their actions committed these
10 crimes.

11 Q. Did you see anybody --

12 A. Again, when I have --

13 Q. -- vandalize your property?

14 A. -- an attorney, I already said
15 that's a question you will have to have the
16 court basically go ahead. So we can move you
17 on.

18 Q. We're not moving on. I want to
19 make sure I understand. Did you see someone --

20 A. What I understand is that I will
21 not be answering that question. I'm invoking
22 my fifth on that question until such time I
23 have an attorney to basically say which
24 portions I need to basically give to you and

1 which portions I do not.

2 Q. I didn't ask you who at this point.

3 Did you in fact see someone vandalize your
4 property?

5 A. Again, when I have an attorney that
6 question will be answered. At this point I'm
7 invoking my fifth. I'm not giving -- nobody
8 has assisted me this far in these proceedings
9 other than family members.

10 Q. And why are you invoking your fifth
11 amendment rights?

12 A. Because I don't know what you're
13 able to ask at this point without my attorney
14 being here and what you're not able to ask.
15 State Farm has not answered or replied to any
16 of my questions or any of my subpoenas or
17 anything. So, no, I'm not going to allow my
18 family to have been victimized and harassed and
19 then victimized again for trying to follow the
20 law.

21 Q. All right. I'm going to ask it
22 another way because I am going to go to the
23 court on this.

24 A. Okay.

1 Q. So let's get the questions down
2 here. Have you ever seen anybody vandalize any
3 of your property?

4 A. Again, I'm invoking my fifth until
5 I have an attorney because my constitutional
6 rights have been violated.

7 Q. Have you, in fact, in court
8 proceedings, stated that State Farm employees
9 vandalized your property?

10 A. I said I believe State Farm had
11 something to do with it.

12 Q. What is the basis for your saying
13 that?

14 A. Because a person within eight miles
15 of State Farm kept calling my home harassing us
16 and I have received a letter from Maryland
17 where State Farm is located and the policy was
18 executed instructing us to move, amongst other
19 things.

20 Q. Who wrote you the letter?

21 A. They were punks. They didn't sign
22 their names. They basically were punks.

23 Q. So somebody sent you a letter
24 that's unsigned --

1 A. Anonymously.

2 Q. -- asking you to move?

3 A. And so it comes from Maryland.

4 That just seems strange.

5 Q. And why is that strange?

6 A. Because why would it come from
7 Maryland when State Farm is the one that's in
8 Maryland and then I was getting calls from a
9 person within eight miles of State Farm's
10 office.

11 Q. And who called you?

12 A. I don't have their name but that I
13 can give you the person's name and address. I
14 made sure I got that and their phone number.
15 Do I have that with me? No.

16 Q. Somebody called you when?

17 A. They called me several times.

18 Q. Saying what to you?

19 A. Basically I didn't answer the phone
20 when they called.

21 Q. Then if you didn't answer --

22 A. I didn't answer the phone. At one
23 particular time my daughter answered the phone.

24 Q. And what did your daughter tell you

1 was said?

2 A. That they were basically saying
3 that we need to move whoever it was. And my
4 daughter is nine years old.

5 Q. Saying you needed to move?

6 A. Right.

7 Q. Okay. And you believe that was a
8 State Farm person who did that?

9 A. I believe that State Farm is behind
10 all of this. And based on State Farm's
11 history, they practice criminal activity. When
12 you have a policy put in place under all cases
13 lie, don't pay your policy. They have a policy
14 that says that. So should I not believe that
15 they didn't do that.

16 Q. What other criminal activity of
17 State Farm are you aware of?

18 A. As I said, basically I believe
19 State Farm was behind those acts basically
20 trying to basically so they wouldn't have to
21 pay the corporation for the damages it caused
22 once they realized they made a mistake and I
23 believe that the damages that they basically --
24 for the damages and the harm they caused my

1 family. My daughter was crying. When our
2 vehicle was vandalized, my daughter was very
3 upset and my kids slept in my room with me for
4 two weeks.

5 Q. That could be, but I'm trying to
6 figure out why you determined it's State Farm.
7 Do you understand proof?

8 A. I already told you, if I'm getting
9 calls from Maryland, I get a letter from
10 Maryland, and then I believe that -- do I
11 believe that it was State Farm who physically
12 came there? No. I believe that State Farm
13 basically incited these things to happen and to
14 occur.

15 Q. Based upon the two facts then, that
16 you got a phone call from Maryland?

17 A. Several phone calls that came from
18 Maryland.

19 Q. Although only one of them was
20 answered?

21 A. I don't know how many was answered.
22 My daughter may not have said. She may have
23 answered the phone and never thought anything
24 about it. She doesn't say everything when she

1 answers the phone. My son could have answered
2 the phone, which he wouldn't be able to give
3 anything because he basically -- which he does
4 as well when he answers the phone.

5 Q. Are you aware of your son or your
6 daughter answering the phone and telling you
7 that someone was calling to harass you?

8 A. As I said, I'm not aware of -- no.
9 All I know is I took down the person's name,
10 backtracked where they live, their address and
11 basically I had the phone number and I got who
12 they were.

13 Q. That was one time?

14 A. And they were calling constantly
15 every day for several weeks.

16 Q. But you didn't answer the phone?

17 A. When I basically after I realized
18 where it was coming from, Maryland, and then I
19 saw that -- then I basically identified that it
20 was like within eight miles. That will be
21 addressed when that person is subpoenaed for
22 court proceedings.

23 Q. Okay. You have the person's name?

24 A. I have their name and their

1 address.

2 Q. And where is the address?

3 A. That's at home. I don't have that
4 with me. Like I said, I have it written on
5 State Farm's policy.

6 Q. But you have that information?

7 A. Yeah, I can e-mail you that.

8 Q. Could you do that?

9 A. Mm-hmm.

10 Q. But you have no proof other than
11 the fact that this person called you from
12 Maryland that he had anything to do with State
13 Farm?

14 A. Basically if you read case law,
15 fraud and crimes can be basically inferred from
16 circumstantial evidence. O.J. Simpson was
17 convicted on circumstantial evidence.

18 Q. Well, I hate to disagree with you,
19 but I think he was found not guilty.

20 A. Well, they were trying to convict
21 him -- my error -- on circumstantial evidence.

22 Q. I want to go back and make sure I
23 understand the harassment claim. Because
24 somebody called you --

1 A. That is not the harassment claim.
2 The harassment claim is also with their
3 attorney basically coming there lying before
4 the corporation, which that causes harassment
5 and things against my family. We don't walk
6 our neighborhood anymore. That's why we're
7 moving, because we don't want to end up in jail
8 because I can very much tell you that if
9 something happened to my children, I don't know
10 how I would compose myself.

11 Q. I want to know what the attorney
12 said that was a lie?

13 A. Read the briefs. That's a bunch of
14 stuff. I can't tell you everything. I can't
15 quote everything verbatim.

16 Q. What do you believe he said?

17 A. Everything he basically said before
18 that corporation was a lie.

19 Q. Everything was a lie?

20 A. Everything that he basically said
21 surrounding the rights of these people was a
22 lie. When you basically are sitting there, if
23 they're starting off telling you that they're
24 directors even though they were never voted,

1 that's lie. So one lie leads to a lot of lies.

2 Q. Well, the first lie was he said
3 that they were directors?

4 A. He said that they were directors.

5 He said that he was working for State Farm. He
6 was working for them. He was working for so
7 forth. Basically if you look at the pleading
8 he also basically went before the chancery
9 court and he basically gave his blessing in a
10 proceeding before a chancery court that it was
11 okay to basically vote on ratifying the actions
12 that the people basically did illegally. And
13 there's a case law that says that voting on
14 ratifying illegal actions is not -- can't
15 rectify the problem.

16 Q. One of the court's opinions
17 indicated that the board of directors removed
18 you as an officer.

19 A. When I basically would not confirm
20 with them. They were not board of directors.
21 They basically said, like the chancery court
22 said, they can't -- said we can't rule until we
23 actually have all the facts of who was the
24 board of directors. We already know the